

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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Attorney-in-Charge

November 15, 2022

BY EMAIL

The Honorable Jennifer E. Willis
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Alcides Mendoza
21 Mag. 8010 (UA)**

Dear Judge Willis:

I write, as counsel to Alcides Mendoza in the above-captioned matter, to respectfully request a modification to Mr. Mendoza's bail conditions to remove his location monitoring device. Pretrial services consents to this request; the government does not object to this request.

On September 1, 2021, Mr. Mendoza was presented in court and Magistrate Judge Debra Freeman released him on his own signature and imposed the following bail conditions: a \$50,000 personal recognizance bond secured by \$2500 in cash deposited with the Court; cosigned by two financially responsible persons; standalone location monitoring; travel restricted to SDNY/EDNY/EDPA and points between for travel; surrender of all travel documents and no new applications; pretrial supervision as directed by Pretrial Services; no contact with alleged co-conspirator unless in the presence of counsel. His conditions were met shortly thereafter.

For more than a year, Mr. Mendoza has remained in full compliance with the conditions of his release. Given this, Mr. Mendoza's pretrial services officer does not believe location monitoring is necessary to reasonably assure Mr. Mendoza's return to court and the safety of the community. Accordingly, Mr. Mendoza respectfully requests the Court modify his bail conditions to permit the removal of the location monitoring device. The government does not object to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Marne Lenox
Assistant Federal Defender
(212) 417-8721

SO ORDERED:

A handwritten signature in black ink that reads "Jennifer E. Willis". The signature is written in a cursive, flowing style.

HONORABLE JENNIFER E. WILLIS

United States Magistrate Judge

November 16, 2022

cc: Samuel Raymond, Assistant U.S. Attorney
David Felton, Assistant U.S. Attorney
Jeffrey Reber, U.S. Pretrial Services Officer